

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE

-and-

EARTH INTELLIGENCE NETWORK

Plaintiffs,

v.

JASON GOODMAN

Defendant.

Case No. 3:17-cv-601-MHL

**PLAINTIFFS DEMAND
TRIAL BY JURY**

SECOND AMENDED COMPLAINT

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, file the following Second Amended Complaint against Defendant, Jason Goodman (“Goodman”).

Plaintiffs seek (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages, (b) prejudgment interest on the principal sum awarded by the Jury from June 15, 2017 to the date of Judgment at the rate of six percent (6%) per year pursuant to § 8.01-382 of the Virginia Code (1950), as amended (the “Code”), (c) reasonable attorney’s fees pursuant to § 18.2-500 of the Code, and (d) costs incurred – arising out of Defendants’ defamation, insulting words, business conspiracy, common-law conspiracy, and unauthorized use of name and picture.

I. INTRODUCTION

1. This case involves the use of social media – principally YouTube – to defame, insult, harass, and inflict injury. Between June 2017 and September 2017, Goodman acted in concert with Patricia A. Negron (“Negron”) and Susan Holmes a/k/a Susan A. Lutzke (“Holmes”)¹ to publish multiple videos in which Goodman and his associates falsely accused Plaintiffs of numerous crimes, held Plaintiffs up to scorn, ridicule and contempt – videos that were calculated to render Plaintiffs odious, infamous and ridiculous. In spite of the pendency of this action, between September 2017 and December 2017, Goodman continued to publish defamatory YouTube videos in combination and conspiracy with Holmes. After Goodman and Holmes dissolved their relationship in December 2017, Goodman continued to publish false and defamatory statements that injured Plaintiffs through July 4, 2019.

2. Plaintiffs seek to recover presumed damages and actual damages, including loss and injury to their business and reputations and compensation for the insult, embarrassment, humiliation, pain and mental suffering inflicted on them as a result of Goodman’s wrongful conduct.

II. PARTIES

3. Plaintiff, Robert David Steele (“Robert”), is a citizen of Virginia. He is 67 years-old. Robert received a B.A. in political science from Muhlenberg College in 1974 and an M.A. in international relations from Lehigh University in 1976. From 1975 to

¹ In the videos at issue in this case, Holmes hid her identity behind an online effigy that Goodman, Negron and Holmes referred to as “Queen Tut”. Goodman created the moniker “Queen Tut” based on the name of Holmes’s email server “Tutanota.com”. The effigy is actually that of Queen Nefertiti. Neferneferuaten (Nefertiti) (c. 1370 – c. 1330 BC) was an Egyptian Queen and the Great Royal Wife (chief consort) of Akhenaten, an Egyptian Pharaoh.

1979, he served in the United States Marine Corps as an officer variously assigned to infantry, intelligence and security/personnel duties in Asia and the United States. Following his service as a Marine, Robert remained in the Marine Forces Reserve until 1996 as an adjunct faculty member at Marine Corps University and developer of the Marine Corps Master Intelligence Plan, ultimately attaining the rank of Major. In 1979, he joined the Central Intelligence Agency (“CIA”) as an operations officer. As a CIA operation officer, Robert obtained a Top-Secret Security Clearance. During three tours overseas, focused on extremist and terrorist targets in Latin America, Robert managed over 100 clandestine assets. Hand-picked to pioneer advanced information technology for the CIA, Robert was a member of the Advanced Information Processing & Analysis Steering Group and the Advanced Program & Evaluation Group. In 1987, he received a second master’s degree in Public Administration from the University of Oklahoma, where he completed a thesis on strategic and tactical national security information management and was elected to Pi Alpha Alpha. In 1990, Robert received a Professional Certificate in Defense Studies from the Naval War College. Robert resigned from the CIA in 1988 to accept an invitation from the Marine Corps to establish the Marine Corps Intelligence Center as a GM-14 civil servant, where he remained until 1993. In 1993, Robert formed Open Source Solutions, Inc., a pioneering open source intelligence (“OSINT”) firm. OSINT is a term used to refer to data collected from publicly available sources to be used in an intelligence context. In the intelligence community, the term “open” refers to overt, publicly available sources (as opposed to covert or clandestine sources). Robert was Chief Executive Officer of Open Source Solutions. For over twenty (20) years, Robert has dedicated himself to teaching individuals and organizations

about the value of holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE). Robert's education, experience, and publications, awards and recognitions are catalogued on his websites, <http://robertdavidsteele.com/> and <https://phibetaiota.net/>. Robert's work has been universally commended. Lieutenant General Patrick Hughes praised Robert as follows:

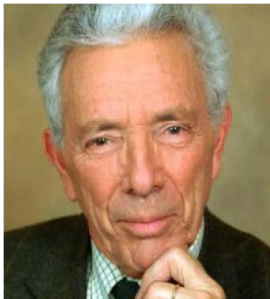


Pat Hughes

Robert Steele deserves our admiration and our focused attention for bringing the idea of open source information to the fore. His passion to serve the nation by developing this new approach...is exemplary.

Lieutenant General Patrick Hughes, U.S. Army (Retired)
Former Director, Defense Intelligence Agency

Major General Pierre Lacoste described Robert as follows:



Pierre Lacoste

Constantly committed to truth and honesty, [his work] demonstrates his ability to grasp the real issues and to take into account the views and concerns of men of good will from all nations and all cultures.

Admiral Pierre Lacoste, French Navy (Ret),
Former Director of Foreign Intelligence (DSGE)

In January 2017, because of his leadership in redirecting the craft of intelligence away from spies and secrecy enabling war and waste towards open sources and methods favorable to peace and prosperity, Robert was nominated for a Nobel Peace Prize. The full text and active links to the nomination were published at the request of Jan Helge Havlik ("Havlik"), Editor-in-Chief of *Defence and Intelligence Norway*, and are/were at all times available on Robert's website. [<https://phibetaiota.net/2017/01/nomination-for->

[the-nobel-peace-prize-robert-david-steele/](#)].² Robert is especially proud of the *NATO Open Source Intelligence Handbook*, published in 2001. Robert wrote over 85% of the Handbook. The publication, which is also available for review on Robert’s website, provides preliminary joint and coalition training information on the subject of OSINT. It discusses the fundamentals of OSINT support to both the all-source intelligence process, and to the unclassified intelligence requirements of operators, logisticians, and civilian organizations participating in joint and coalition operations. In a preface to the Handbook, General W. F. Kernan, General, U.S. Army (“General Kernan”), acknowledged that the publication “has benefited greatly from the continued collaboration between my staff and the staff of Open Source Solutions Inc. [*i.e., Robert*]”. [\[https://phibetaiota.net/wp-content/uploads/2009/07/NATO-OSINT-Handbook1.pdf\]](https://phibetaiota.net/wp-content/uploads/2009/07/NATO-OSINT-Handbook1.pdf).

Until publication and republication of Goodman’s videos, tweets, and emails and other statements at issue in this action, Robert enjoyed an untarnished reputation.

4. Plaintiff, Earth Intelligence Network, is a not-for-profit, 501(c)(3) corporation founded by Robert in 2006 (Virginia State Corporation Commission ID # 0670760-8) (Federal EIN # 20-828XXXX). The original purpose and long-term focus of Earth Intelligence Network is to teach citizens the urgency of demanding holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE) as the foundation for enlightened self-governance. One of Earth Intelligence Network’s projects is called “#UNRIG”. #UNRIG is an educational campaign to communicate to all citizens the possibility of an ethical, legal, non-violent restoration of integrity to the

² Goodman visited and reviewed the contents of Robert’s websites prior to publishing the false statements at issue in this case. Therefore, he knew that Robert had been nominated for a Nobel Peace Prize.

United States Government. Between 2017 and 2019, Earth Intelligence Network's operations and #UNRIG's campaign were funded by public donations. Earth Intelligence Network is fully transparent and accountable to its donors. All funds raised for the #UNRIG national tour are fully accounted for at the Budget Page published on the website of for the #UNRIG project, <https://www.unrig.net/>. In June 2017, the core team members of the Earth Intelligence Network were Robert and Dr. Cynthia Ann McKinney ("Dr. McKinney"). Dr. McKinney is first black woman to be elected to Congress from Georgia. She is internationally-recognized as a humanitarian and anti-war activist.

5. Goodman is citizen of New York. He owns, maintains and operates multiple Internet and social media properties, including a YouTube channel [www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ], a Facebook page [<https://www.facebook.com/Crowdsource-The-Truth-1331354320209243/>], a Twitter account, (@csthetruth) [<https://twitter.com/csthetruth?lang=en>], a Periscope account [<https://www.pscp.tv/csthetruth/>], and an account at Patreon.com, [<https://www.patreon.com/crowdsourcethetruth>]. The name of Goodman's various social media properties is "Crowdsource The Truth" ("CSTT"). Goodman uses his YouTube channel and videos, Facebook page, Twitter, Periscope and Patreon accounts to advertise the business of CSTT and for purposes of trade. Goodman solicits donations, advertises products and derives revenue from the videos uploaded to his YouTube Channel, to his Facebook, to his Twitter and Periscope accounts, and to Patreon.com. The traffic to Goodman's YouTube channel and his Twitter, Periscope and Patreon accounts, including visits by sponsors, patrons and other viewers from Virginia, produces substantial recurring revenue for Goodman. Goodman and his agents have been physically present

in Virginia on multiple occasions in connection with the production of his YouTube videos. His websites are active. Goodman's videos target subscribers, patrons and viewers located in Virginia and elsewhere.

6. In 2017, Goodman and Negron co-produced numerous videos uploaded to the CSTT YouTube channel. Prior to September 1, 2017, Negron appeared and actively participated in virtually every video, one of which was even filmed at Negron's home.

7. Holmes is the person masquerading as "Queen Tut" in the YouTube videos at issue in this action. Goodman identified Holmes as being "Queen Tut" in several videos he uploaded to YouTube between September 2017 and April 2019, including <https://www.youtube.com/watch?v=kYOikz5mjbw&t=1707s> (Video at 13:50 – "I don't know that that claim is really, ya, he said it with a straight face, Susie..."); <https://www.youtube.com/watch?v=8Tdkawt5FNU> (Video at 14:03 – "even if we accuse him [referring to Robert] of lying about writing the open source intelligence manual, now that's information that came to me from Queen Tut, a woman who his own lawsuit has revealed to be Susan Lutzke"); <https://www.youtube.com/watch?v=O2MmaE6Wwtk> (Video at 44:22 – Queen Tut is "Susan Lutzke. Let's call her who she is"); <https://www.youtube.com/watch?v=1koAEHYbZTA> (Video at 18:30 – Goodman spoke with "Susan Lutzke Holmes Tut on the phone almost every day" while they were producing the defamatory videos at issue in this action). Goodman and Holmes collaborated extensively in the production of Goodman's videos. They spoke by telephone and emailed.

III. JURISDICTION AND VENUE

8. The United States District Court for the Eastern District of Virginia has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

9. The Court has personal jurisdiction over Goodman, who has filed an answer and made a general appearance in this action.

10. Venue is proper in the Richmond Division of the United States District Court for the Eastern District of Virginia because Goodman and his agents published and republished defamatory statements to a wide audience that includes persons who reside within the Richmond Division. A substantial part of the events giving rise to the claims stated in this action occurred in the Eastern District of Virginia.

IV. STATEMENT OF THE FACTS

11. On June 14, 2017, Goodman and Negrón published a video on YouTube entitled, **“Clear and Present Danger (Calm Before the Storm?) #maerskmemphis”**. In the video, Goodman and Negrón claimed that CSTT’s “George Webb” had “intel” from a source identified as “Deep Uranium”, indicating a “strong possibility of Clear and Present Danger due to illicit radiological material on board” transoceanic container ship, Maersk Memphis. Goodman and Negrón encouraged the “Crowdsource community” to spring into action and alert the United States Coast Guard that there was a “dirty bomb” aboard the Maersk Memphis. Goodman told CSTT subscribers to “Call the port authority – that’s an excellent idea. Someone call the port authority there – in Charleston.”

Someone, in fact, called in the putative dirty bomb threat, which caused a terminal at the Port of Charleston, South Carolina, to be shut down.

12. In truth, there was no “intel”. The dirty bomb was a hoax. The Federal Bureau of Investigation (“FBI”) immediately opened an investigation into the false report of a dirty bomb aboard the Maersk Memphis.

13. Robert learned about the “dirty bomb” hoax, and chose to distance himself from Goodman, Negron and CSTT. Robert immediately canceled an interview with Goodman and Negron planned for June 15, 2017. Robert informed Goodman by private email that he (Robert) no longer wanted anything to do with Goodman and CSTT. Upon receipt of Robert’s email, and in retaliation and reprisal for Robert’s decision to no longer have anything to do with Goodman and CSTT, Goodman, in combination and concert with Negron and Holmes, began an unprecedented Internet and social media smear campaign against Plaintiffs.

A. False and Defamatory Statements Prior to September 1, 2017

14. Beginning on June 15, 2017 and continuing through August 30, 2017, Goodman, Negron and Holmes combined, associated, agreed and acted in concert (most times together on camera) to publish the following false, defamatory and actionable statements of and concerning Plaintiffs:

a. On June 15, 2017, Goodman and Negron produced and published a video on YouTube entitled, “**Deep State Panic Attack**”. In this video, Goodman encourages viewers to demand a return of their donations from #UNRIG. At 4:24 of the video, Goodman states “The comments I kind of agree with. I was a little bit cautious with Robert David Steele and I didn’t trust him either, Pamela, when he went on

Fandango's³ show yesterday ... so yeah, I want my money back too Karen. I'm going to go call American Express and see if I can cancel that donation." At 20:55 of the video, Goodman states "So Alex says RDS is a scam. I got to admit I feel a little betrayed by him".

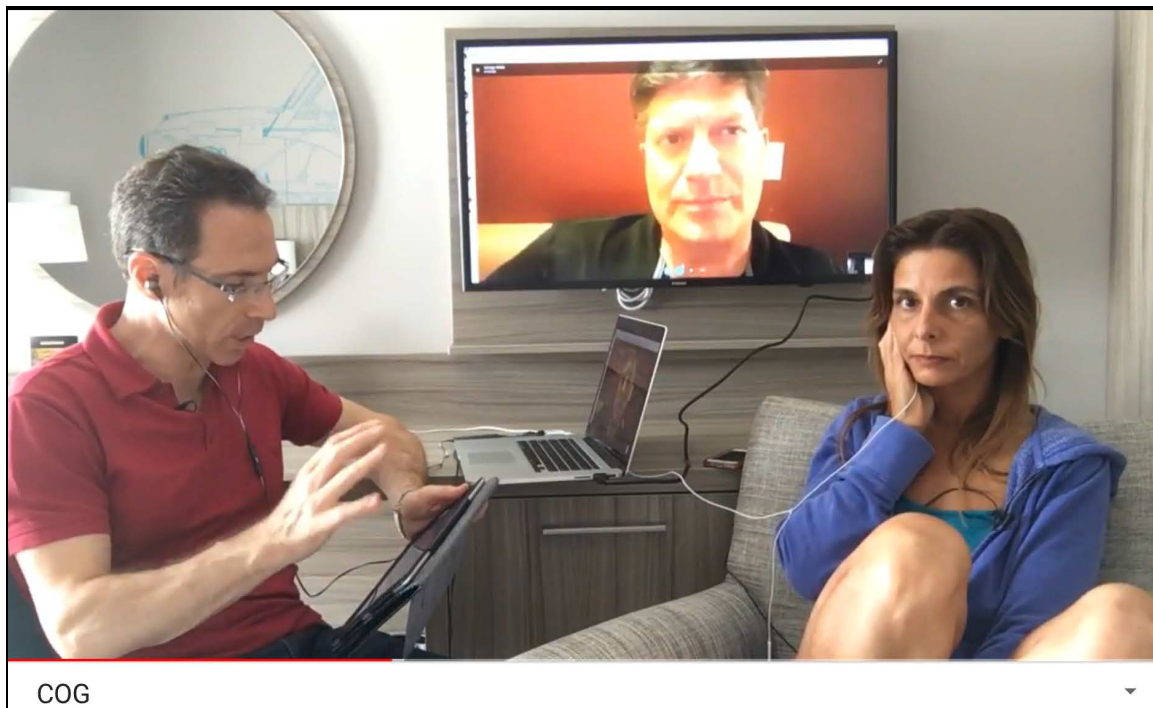
b. On June 16, 2017, Goodman produced and published a video on YouTube entitled, "**Getting the Dirty Bomb Story Straight**". At 20:24 of the video, Goodman states "We made a big mistake with Robert David Steele and I'm going to have to communicate with him about this ... We've raised a lot of money for him. We need to apologize to you guys for doing that, and I'm not suggesting. I'm not saying you should get your money back from Robert Steele. He specifically told me he would get very pissed if people did ask for their money back which I found a curious thing for him to say."

c. On June 16, 2017, Goodman and Negron produced and published a video on YouTube entitled, "**The Failing New York Times**". As with all the videos at issue in this action, "**The Failing New York Times**" was scripted ahead of time. Goodman and Negron discussed the subject matter and content via email, telephone and/or text message. They agreed upon the storyline/thesis, theme and tone. Goodman and Negron speak with one voice. Negron makes no attempt to correct, contradict or distance herself from Goodman. It is clearly a joint production effort. At 16:10 of the video, Goodman states "I want to invite our friend, Robert David Steele, to uh give back the money to all the people that we raised money for his organization the other day. We have been getting so many emails from people who are angry and I don't want to tell

³ The reference to "Fandango" is a reference to Manuel Chavez, a content creator and publisher of videos, known on the Internet as "Defango".

everybody to demand their money back because Robert David Steele has specifically told me I had better not do that, so I'm inviting him to graciously refund it to anyone who is angry again, and there are a lot of people." At 24:45, Goodman states "So I'm making an open call right now. Everyone should just go directly to their credit card company and cancel the charge and if there are financial crimes experts out there I'd like to know if its legal for Mr. Robert David Steele to make up lies about me ... and spread these lies to our viewers". On and after June 16, 2017, many of #UNRIG's donor's followed Goodman's direction, and demanded the return of their donations. Some, acting upon Goodman and Negrón's advice and at their direction, filed claims of "fraud" with their banks to undo and reverse the donations to #UNRIG.

d. On June 20, 2017, Goodman and Negrón produced and published a video on YouTube entitled, "**COG**". Goodman and Negrón appeared together in the video, which was filmed in a hotel room in London, England:



In the video, Goodman and Negron speak jointly about Robert. Beginning at 25:26 of the video, Goodman states “**Trish – I’m glad you mentioned stealing**, because you’ve just reminded me of something – particularly the robber David Steele ... Many of our viewers have expressed real anger at feeling tricked by the campaign from Robert David Steele. And I assure you, we were tricked by him as well”. (Emphasis added). Negron makes no attempt to correct Goodman. By her silence and visual expressions of agreement in the video, she joins in his false and fraudulent accusations of stealing and fraud. At 1:13:00 of the video, Goodman calls Robert the “robber David who Steals”. At 1:13:55, Goodman and Negron address Robert directly. Goodman again calls Robert the “robber David who Steals from our audience ... and puts out false information”. And, at 1:17:21, Goodman, for a third time in a single video, falsely accuses Robert of stealing from the CSTT audience.

e. On June 26, 2017, Goodman and Holmes produced and published a video on YouTube entitled, “**Queen Tut call re: Robert David Steele #Unrig Fraud Claim**”. Goodman describes the video as follows: “The angry response from the Crowdsourcing community regarding the individual I have (somewhat) jokingly dubbed ‘The Robber David who Steals’ has been overwhelming. Many Crowdsourcing community members have been sending me email exchanges they have having [sic] with RDS and they are not happy ... Confidential Crowdsourcing contact Queen Tut believes RDS has perpetrated a deliberate fraud and details her position in this phone call.”⁴ The video

⁴ Goodman’s videos uploaded to YouTube solicit money from viewers, subscribers and patrons and contain a “Legal Disclaimer”: “Sponsorship of Crowdsourcing the Truth is made at the sponsor’s sole discretion. Sponsorship funds are not tax-deductible, are non-refundable, and do not represent any ownership, equity interest or decision-making authority in the organization.”

features a still shot of Goodman and Holmes side-by-side, together:

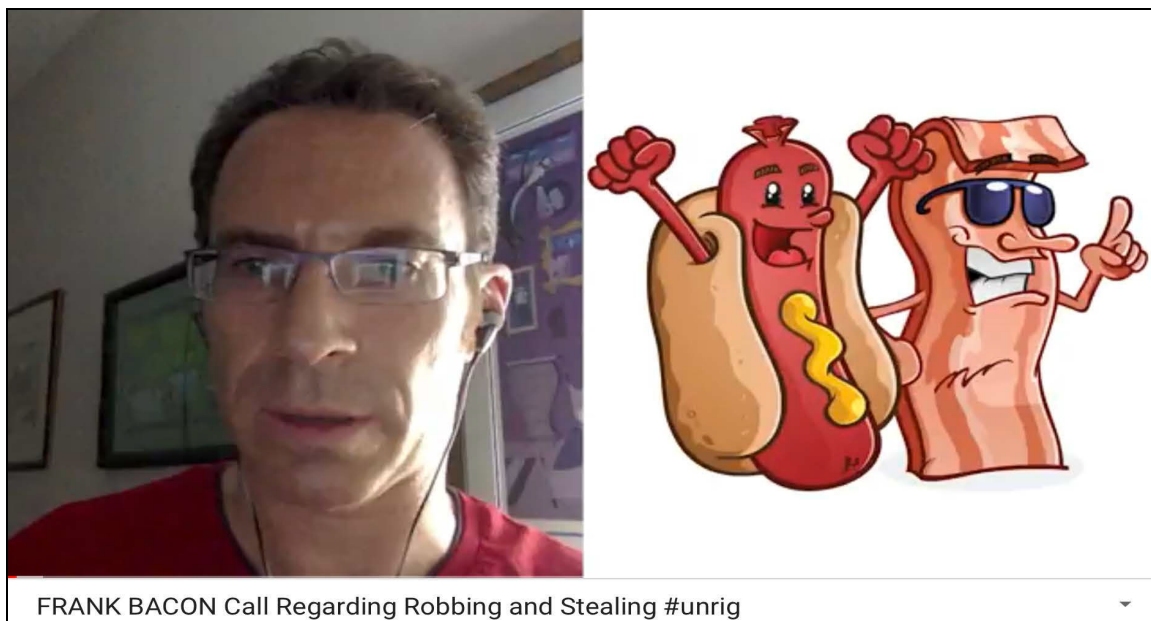


During this interview, Goodman and Holmes make the following false and defamatory statements: At 2:49 of the video, Goodman states, “Well I think he’s a targeter, he’s a person er I mean I question if he, if any of his credentials are authentic. I think he’s just a cheap con man.” Holmes then says, “I totally agree”. At 3:42, Goodman states, “Well that’s his motto. What can you do for me?” At 4:18, Goodman states, “He knows it’s a useless campaign he’s just trying to suck \$250,000 out of people.” At 4:52, Holmes states, “Oh man, I get it. He’s really conning people and he’s trying to manipulate me.”. At 6:11, Holmes states, “That’s the last email I sent and I knew I got him ok.” At 8:21, Goodman states, “I think he’s involved in a pretty serious financial scam. Uh, I think that there’s a possibility that a Rico charge could be involved because he has Defango with him. I think that he’s uh defrauding people across state lines. I mean I’m not a lawyer of course, but it seems like he is doing things that are very criminally actionable.” At 9:13, Holmes states, “His MO of like threatening and crushing the little guy, but sucking up to the power players is very obvious.” At 11:02, Goodman states, “You know I’m

obviously not a mental health professional but it certainly seems he's got some kind of schizophrenic behavior there." Holmes then states, "And I believe he is an intentional operator", to which Goodman states, "Oh, I agree". At 13:43, Holmes states, "When you look at his behavior, his pattern of behavior with this scam of the Electoral Reform ... I think Cynthia is the latest in the reinvention". At 26:26, Goodman states, "Its people who are sick and tired of people like Robert David Steele. The robber David who Steals."

f. On June 26, 2017 at 2:11 p.m., Goodman republished his interview with Holmes to a new target audience by tweeting the YouTube video to his Twitter followers. Goodman habitually engaged in this form of ritual republication.

g. On June 27, 2017, Goodman produced and published a video on YouTube entitled, "**FRANK BACON Call Regarding Robbing and Stealing #unrig**". As part of the modus operandi of the conspiracy and scheme to defame Plaintiffs, Goodman employed memes and caricatures to hide the identity of the speakers. The "FRANK BACON" video features Goodman speaking with an anonymous person who is represented by the caricature of a hotdog and a strip of bacon:



At 2:38 of the video, Goodman states “Let’s assume for a moment he’s a con man or a hypothetical situation in which he may be a con man, claiming to be an ex-CIA agent is sort of the perfect con.” At 10:21, Goodman admits that he personally contacted the Coast Guard and represented that he had “intelligence” coupled with Government reports that a “dirty bomb” was on board the Maersk Memphis, and he “instructed” the Coast Guard to inspect the ship. At 19:25, Goodman calls Robert a “loser”.

h. On June 29, 2017, Goodman and Negron produced and published a video on YouTube entitled, “**Squidward v. Sponge Bob**”. Goodman and Negron again appear together on video and again engage in a joint discussion about Robert in which they (with Goodman as lead spokesman) make false and defamatory statements about Plaintiffs. At 19:10 of the video, Goodman states “What Google helped him do was to file privacy complaints [Goodman indicating quote/unquote “privacy complaints” on video] for videos that we have that include evidence of Robert David Steele committing fraud, and he’ll now make a privacy complaint about this, but to say that is like saying Google helped me to search for something. The entire corporation helped me when I typed in is Robert David Steele a lying moron? and the answer came back yes.” At 27:37, Goodman states “I will say the Robber David who steals has already put a privacy complaint on that video.” At 27:58, Goodman states “if you’re going to appear on there [the Alex Jones show, *Infowars*] ...and you are going to claim to be nominated for a Nobel Peace Prize even though you are doing the nominating yourself or having some friend of yours do the nominating. Incidentally, I hope that the members of the Crowdsourcing community will nominate Mr. George Webb Sweigert, Patricia Negron,

and myself, Jason Goodman, for Nobel Peace Prizes not because I think we deserve it because I want to show what a fraudster this individual is.”

i. On June 29, 2017 at 4:34 p.m., Goodman republished the “Squidward v. Sponge Bob” YouTube video by tweeting the video to his Twitter followers.

j. In the YouTube video “**Squidward v. Sponge Bob**”, Goodman and Negrón refer to another video interview conducted by Goodman in which Goodman appears jointly with and talks to yet another anonymous caricature, “Squidward Tentacles”. Goodman, *inter alia*, republishes the following false statements by “Squidward”: “this gentleman [referring to Robert] came on your show and he deceived 10,000 people to donate \$15,000 ... he committed interstate wire fraud”. Goodman replies, “I’ve suspected that from the beginning, yes ... I think he’s deceived Dr. McKinney as well”.

k. On June 29, 2017, Goodman and Holmes produced and published a video on YouTube entitled, “**Queen Tut call 002**”. Goodman and Holmes posted the video to CSTT’s account at Patreon.⁵ Goodman and Holmes again appear together on video, and again engage in a joint discussion about Robert. At 5:11 of this video, Goodman states “[h]opefully, the FTC or some other law enforcement body will, can take this over and prosecute him [referring to Robert] with criminal charges”.

l. Goodman also employed agents to communicate on his behalf directly with Robert via email. One such agent is a person “Ralph O. Davis” (“Davis”)

⁵ “Patreon.com” is a social media membership platform that “makes it easy for content creators to get paid” for creating videos, blogs, songs, etc. Fans subscribe and pay a few bucks per month OR per video, and the content creator gets paid by Patreon every month or every time he release something new. [<https://www.patreon.com/>].

from Richmond, Virginia. Davis emailed Robert on multiple occasions in June, July and August 2017. On July 3, 2017, Davis emailed Robert as follows:

“Robert, I thought there might be an outside chance that you’re a big enough person to willingly reconcile w/Jason for reasons beyond your still inexplicably vehement derision of him based on your stated subjective 'suspicion' of his supposed Mossad affiliation. Sadly, I apparently misjudged you. There's no independent or verifiable support for that view yet you cling to it as matter of fact. It's wholly irrational, ..or you have a covert agenda to disrupt for personal or professional motives.

Since you're unwilling to even acknowledge your provocative role in primary responsibility of this petty distraction, I have no further expectation of its satisfactory resolution and can't in good conscience support someone so compromised by exercise of unstated agenda. I therefore reiterate my request for refund of my \$100 contribution. It was based on presented sensibilities that you now appear to disingenuously manufacture when seeking to appeal, then conveniently discard when your personal agenda overrides any sense of obligatory responsibility to principles you alleged to champion. In doing so you contradict what you purport to represent as ostensible reformer of malfeasance. It's very disappointing and troubling considering the rarity of people actually aware, awake and moved to the necessity of reestablishing standards of morally responsible behaviors where that matters most.

You now appear to willfully represent something cynical and hypocritical to any higher purpose and by doing so misrepresented yourself and your intent in your violent about face after the interview with George Webb for what's clear now as no real reason.

You've willfully defrauded. Please process the refund asap.”

On July 14, 2017, Davis emailed the following:

“Good morning, Robert. How in hell are you? It's certainly where we are if only in its better suburbs, eh? The degree of mayhem presently building is truly mind boggling, and you certainly seem tainted by one of its many afflictions, so sorry to say.

As I responded in the below to one of your bedfellows who used the same tactics to vilify those you, too, betrayed so willfully, if more personally, I noted that for every such Tom, unfortunately, there's a Robert as well. Not good of you, my friend. Not honest, ethical or intelligent in true sense. Deceit and betrayal never goes out of style for those with corrupt agenda. So, Robert, how, in hell as it were, do you restore to government what you do not possess in the first place?

...

Do the right thing, Robert. Refund what you took through fraud.”

Just as Goodman, Negron and Holmes’s videos got nastier and more malicious over time, so did Davis’ emails. On July 28, 2017, Davis sent Robert the following email:

Hey, Robert! How goes life of fraudulent crime in total political pretense, my fakey friend? It can't make anyone proud, can it? You have kids, don't you? So, does Cynthia have any suspicion that she's hooked-up with a smiley, shady character who's setting her up for a fall? Life must get complicated when blow-back ensues, as it inevitably does. While you do talk a good line, I must admit, it's one that self exposes the inevitable contradictions that you just can't dance around for long. Is it ever embarrassing that your nasty little smear attempt only damaged your own cover? Too bad for Cynthia, good lady she apparently is, to have found herself in the grip of a pro-co-intel charlatan handler.

Anyway, still time to redeem yourself if you fess-up, do compensation and beg your many victims for forgiveness, you old fraud. George and Jason continue to gain deserved traction with Awan's arrest and the avalanche of evidence now finding light of day that can't be suppressed as you and yours must have hoped. But, you, too, will find yourself exposed, Robert. Sad day that, eh? It will feel like sitting on top of a pile of depleted uranium that you've attempted to obscure.

Why not get started first with a public apology to Jason, George, Trish and Cynthia, then refunding all those you've pretentiously defrauded? Imagine the sense of freedom from convoluted fiction! As difficult as it is for you, do the right thing.”

On August 9, 2017, Davis emailed Robert as follows:

“Well, Robert, I understand how time consuming it must be trying to persuade an unsuspecting audience that you're; 'Authentic, Inclusive, and Truthful', (AIn'T) ..when it just ain't so. What tangled web, eh, my contradictory snake-oil friend?

Maybe Alienate, Incite and Trouble would be more apropos to your agenda? So, has Cynthia caught on yet to your set-up for her fail? It's just a matter of time unless you make amends to those you've already betrayed. So, to that end, please send the refund that you solicited on false pretenses at your earliest opportunity.

You may be aware that all of your recorded slanderous assertions regarding George and Jason are now coming back to haunt your laughably pretentious themed bus tour. Seriously, better think harder about reconciliation over law suits.”

m. On August 7, 2017, Goodman, Negron and Holmes produced and published a video on YouTube entitled, “**Queen Tut 003**”. Robert was notified of the video by Carrie Lavender. At 10:42 of the video, Goodman claims to have been contacted by a “secretive group”. Goodman bleeped out the name of the “secretive group”. At 11:02, Goodman states to Queen Tut that “they were very interested in communicating with you [Queen Tut] about your research into the activities of our friend Robert David Steele.” At 11:18, Goodman stated that “they want to basically [bleep] Robert David Steele, [bleep] and they felt that you had presented good information that might lead them in that direction, specifically with regard to your communications with Rand Paul’s office and Robert David Steele’s misrepresentation that he was having them draft a bill for him, and the fact that he had raised money under that representation that that was happening.” Queen Tut replied, “I’ve got all the emails, Jason, I’ve got it all.” At 12:08, Goodman states to Queen Tut “I want to put you in touch with them ... I’ve only spoken to them for a limited amount ... I find it really difficult to believe that he was ever in the CIA because he just seems so fucking stupid ... he’s engaged in an operation to compromise Cynthia McKinney and basically co-opt her credibility and ... destroy her reputation.”

n. On August 11, 2017, Goodman published the following false and defamatory statements in an email to Dr. McKinney:

“From: Jason Goodman <truth@crowdsourcethetruth.org
Subject: Your association with Robert David Steele

Dr. McKinney,

Both myself and George Webb have made several attempts to contact you, but have not received a direct response. I hold you in very high regard and I am slightly confounded by your decision to align with Robert David Steele. In my estimation he has repeatedly made ignorant and even racist comments, has defrauded my audience of money, has personally and publicly insulted me and is actively attempting to co-opt your credibility to raise funds. I would really appreciate it if you would agree to an interview via Skype to address these concerns. Many people in our audience have concerns about your association with RDS given his ongoing abusive behaviors documented in a number of videos. Thank you for your consideration, I await your response.”

o. On August 11, 2017, Holmes entered an educational chat room managed by Dr. McKinney, using the pseudonym “Pat”.⁶ Holmes posted the following question and comments:

“Guest Pat

00:50AM

Cynthia: Is it true that your student loans are being paid off from UNRIG funds? RDS states this on his website.”

Dr. McKinney replied to Holmes as follows:

Cynthia McKinney

04:03AM

Hi Pat, you must've missed Robert's very public statement that donated IndieGoGo funds go solely for #UNRIG operational costs. Robert David Steele has stated this policy publicly, which I wholly endorse.

⁶ As Goodman was well-aware, Holmes used multiple pseudonyms, including “Pat Ingram”.

p. On August 13, 2017, Goodman, Holmes and Negron produced and published a video on YouTube entitled, **“Queen Tut 005 - Damning Evidence of Fraud in the #Unrig Campaign”**. A description of the contents of the video states, “Queen Tut is back with a vengeance as she rains hellfire down on Robert David Steele’s fraudulent activities with regard to the #Unrig campaign. We invite Dr. McKinney to come forward and explain her continued affiliation.”. The video refers explicitly to emails and document exchanges between Goodman and Holmes in furtherance of their joint undertaking to defame Plaintiffs. Goodman, Holmes and Negron appear in a still shot together throughout the video. As represented by the still shot, the Defendants have combined and act in concert to defame Plaintiffs:



As evidence of the conspiracy between Goodman, Negron and Holmes, at 1:27 of the video Goodman confirms that **“I really want Trish and you and I to really collaborate on this going forward”**. (Emphasis added). At 2:39, Negron states “You know Queen

Tut, I had seen an interview on Infowars when they were talking about the UNRIG came and just all the body language coming from RDS was just deeply disturbing to me and suggested, you know, a lot of maybe ulterior motives". At 3:25, Holmes states "There's a theme here that I see going on ... I introduced the first idea, Jason and I did in June, about this scam, the UNRIG scam". At 5:04, Holmes states that there is a "dynamic that's coming off of Robert David Steele [in interviews with females] which I consider to be abusive". At 5:08, Negron states that Robert is "predatory in nature". At 6:10, Holmes states "I just want to make the statement that it is my assessment that Robert David Steele and Cynthia McKinney have a pay-to-play operation going on". At 14:42, Holmes states "the UNRIG scam. It's a total scam ... That's what it needs to be called because that's what it is." At 14:52, Goodman states that the objective of the UNRIG campaign is to "get money" for Robert. At 15:06, Holmes states that "absolutely ... the bottom line is money for Robert David Steele." At 16:18, Negron states that the CIA "probably told Robert he could keep whatever money he raised", which Goodman comments, "exactly, exactly". At 18:18, Holmes states "Cynthia McKinney knows that RDS is soliciting donations in her name to pay off her student loans, taxes, and to provide some type of compensation." At 18:48, Holmes calls Robert "the creator of the UNRIG scam". At 24:59, Holmes states "Robert David Steele is the architect of all the scam and has promoted and stated many, many lies, constantly. He consistently lies". Viewers of **Queen Tut 005** immediately understood the video to convey a defamatory meaning. On August 14, 2017, Robert received an email about the video that reads: "I support #Unrig and hold you both in High Regard – WTF is this about?". Even long-term supporters of

Robert and UNRIG were impacted by the **Queen Tut 005** video. One such supporter emailed Robert as follows:

“Robert,

This video <https://www.youtube.com/watch?v=ZhbeltyhnVk> is causing us some problems at VL. I am getting numerous emails, pms and comments about it asking me to rethink my support for #UNRIG.

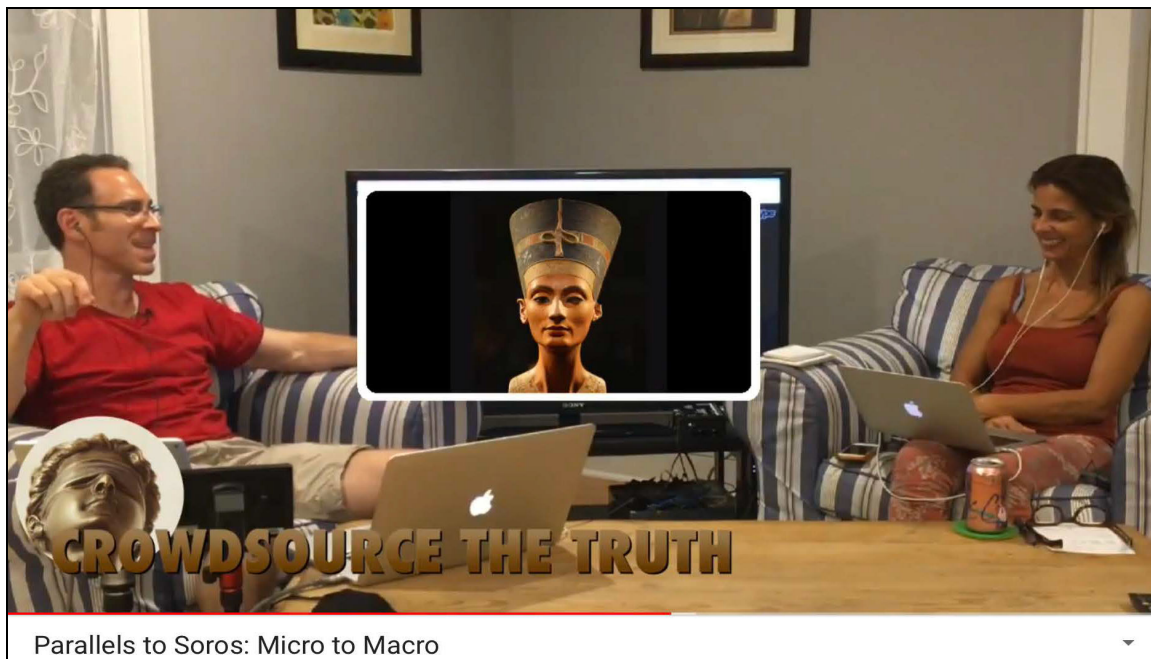
Yes, many are Goodman shills but a few are genuine long time subs of mine. With that said, I need to address this asap to nip it in the bud. If you want to address it with an update video, that would be great, if not, I can do it.

Bottom line is that I need to be able to report with confidence that the allegations in the Goodman video are without merit.”

Another person reported to Robert that:

“I finally listened to the new Queen Tut video. Jeez! When I thought they couldn’t go any lower! Trish Negron says defamatory things about you, e.g calls you a predator. All three defame Cynthia a lot too.”

q. On August 17, 2017, Goodman, Negron and Holmes produced and published a video on YouTube entitled, “**Parallels to Soros: Micro to Macro**”. The video shows Goodman, Negron and Holmes acting together and in concert:



At 24:26 of the **Parallel to Soros** video, Holmes states that “this kind of person [referring to Robert] is a danger to the alternative news community and he has been operating for way to long ... We want him to be gone now”. At 29:24, Holmes states that Robert’s interviews reveal his “schizoid and abusive behavior.” At 40:14, Goodman, Negrón and Holmes laugh derisively about Robert. Holmes repeats and republishes many of the statements made in prior videos, including **Queen Tut 005**.

r. On August 26, 2017, Goodman, Negrón and Holmes produced and published a video on YouTube entitled, “**Unrig Cynthia McKinney**”. At 8:53 of the video, Goodman states “it’s keeps getting stronger and stronger the evidence of fraud”. Beginning at 9:05, Holmes states “what we started in June,⁷ where I was able to present evidence about the Electoral Reform Act of 2017 being a scam that he had been perpetuating for a number of years ... That the whole Electoral Reform Act is not an act ... it’s a scam.” (Emphasis added). At 10:09, Holmes states “The Electoral Reform Act, once again, it’s not an Act. It’s a scam”. At 10:30, Holmes states “It’s fascinating to see that this UNRIG scam is continuing um no matter how much exposure we’ve given about this fraud that RDS feels completely confident going forward with this scam and Cynthia McKinney with him.” At 15:41, Goodman states “Now I want to clarify something because we’re not doing this to be vindictive, we’re not doing this because we dislike Robert David Steele, although I personally do. We’re doing this because [laughter] ... [Goodman changes the subject]”. At 16:53, Goodman states “Robert David Steele’s behavior represents the exact same type of fraud that sucks out money from the

⁷ The specific pronouns and identical language employed by Goodman, Negrón and Holmes demonstrates that they were acting in concert and that they harbored spite, ill-will and actual malice towards Plaintiffs.

population. He's lying. He's, you know, representing that he's going to do this Election Reform Act, but as Queen Tut has pointed out, there's evidence that he has made no effort to do that and in fact has misrepresented efforts that he has claims to have made, which he clearly has not." At 17:42, Goodman states "So this is what we're doing to sort of take some power away from Robert David Steele and disallow him from cheating people like this." At 19:06, Holmes states "And this is the nail in the coffin for Robert David Steele's platform for being the Open Source guy. He is not the open source guy, he never has been ... He's created a scam for many many years and he's been defrauding people for a very long time." At 20:47, Goodman states "It's another example of someone co-opting the credibility, Robert David Steele co-opting the credibility of Cynthia McKinney who is someone a lot of people trust." At 21:08, Goodman states "I've been super disappointed that we keep reaching out to her (McKinney), we keep reaching out to her, and she's not directly responding to say why are you involved with this guy". At 21:32, Negron states "No, he's a serious con man, but I mean the bigger point being, you know that this is a serious fraud. I mean that it is a fraud. No question." At 22:50, Holmes states "Everybody out there you need to email people or Twitter people and tell them Robert David Steele is over, his whole platform is over because General Kernan has stated so." At 23:44, Goodman states "He's one little brick in that in that huge gigantic wall, and if we could take out the bad bricks one by one, maybe the wall will collapse." At 24:46, Goodman states "So if someone like Robert David Steele can infiltrate that community be perpetuating the same kind of false narrative and permeate what we all perceive as real news from honest independent journalists that could very well be his purpose, we don't know, but that's what we are trying to expose." At 26:36,

Holmes states “Robert David Steele and UNRIG are trying to raise money, as much money as they possibly can to fund their little scam.” At 27:35, Holmes states “She [Cynthia McKinney] is still part of that fraud”. At 27:57, Holmes states “See these scams continue.” At 28:05, Holmes states “Cynthia McKinney is also a fraud too. [Goodman interjects “oh”]. She is willing to associate with Robert David Steele”. At 30:05, Goodman states “This is Queen Tut talking about the uh fraud that is UNRIG and what we have just heard from the Queen is that Cynthia McKinney by remaining complicit in this fraud is herself.” At 35:48, Holmes states “Why would she continue to associate herself with somebody who has been proven to be a fraud by a retired Army General.” At 36:48, Negron states “Which would explain her being susceptible to this fraud by Robert David Steele”. At 39:41, Holmes states “I believe that she [Cynthia McKinney] is a pro-Islamic Brotherhood sympathizer”. At 39:55, Holmes states “I believe that she is possibly um compromised, not by just Robert David Steele but by other parties that are foreign actors. Foreign nations.” At 42:03, Holmes states “and she’s only getting trips here to the US based on these fraudulent donations to this fraudulent UNRIG scam, and she knows its fraudulent.” At 43:36, Holmes states “Everybody can go look at the UNRIG.net. We suggest you do it. We suggest you look at Robert David Steele’s UNRIG information. Look at all of it. We want everyone to do that, so you can see their whole drive is to get their hands on these corrupt Congressman and have them do this pledge”. At 45:12, Holmes states “I feel that she’s [Cynthia McKinney] un-American”.

s. On or about August 26, 2017, Holmes falsely stated on *Trello.com* that Robert did not author the NATO Open Source Intelligence Handbook. In truth, Robert wrote and is responsible for over eighty-five percent (85%) of the Handbook, as

Goodman, Negron and Holmes knew from their review of Robert's website and the Handbook itself.

t. On August 30, 2017, Goodman and Holmes produced and published a video on YouTube entitled, **"Je Suis Queen Tut - Is Robert David Steele Running an Op Against George Webb & CSTT?"**. The video confirms that Goodman and Holmes exchanged messages and collaborated prior to publication. The video features a photograph of Robert and Dr. McKinney with a threatening circle and a line through the photo:



Goodman describes the video as follows: "The mighty Queen continues to call out the Robber David who Steals on his potentially fraudulent activities". The video republishes, directly and by implication, some of the same statements about Robert and #UNRIG as were published in prior videos.

B. False and Defamatory Statements Since September 1, 2017

15. Between September 1, 2017 and December 25, 2017, Goodman and Holmes continued to act together, in concert and in furtherance of the conspiracy to defame Plaintiffs. They published the following false and defamatory statements and insulting words:

a. On September 6, 2017, Goodman and Holmes produced and published a video on YouTube entitled, “**Crushing Grip of the Deep State**”. At 1:27 of the video, Goodman states “We’re going to be talking about the deep state and it’s crushing grip, how it’s been exerting its force on the President of the United States, how it is operating through a variety of different apparatchiks if you will, including our personal favorite, Mr. Robert David Steele.” At 4:41, Holmes states “you know he’s running an operation, he has a team of people he works with and they continue to go after us ... and [CSTT] ... and try to discredit us, but here’s one of the things that’s come forward recently, there is now a taped interview that reveals that RDS was considered somewhat of a wacko [Goodman laughs] and was not really considered for any serious position on the libertarian election ... team”. At 7:10, Goodman states “what we are proposing is that Robert David Steele is trying to fool everyone and that Robert David Steele is not in fact engaged in a campaign to execute election reform and Queen Tut you were one of the very first crowd source the truth community members to come forward with evidence. This is the key I know it’s very difficult for Robert David Steele’s thick skull and dense brain to absorb information. It’s a side effect of being a total moron, but the fact is when you accuse someone of fraud and you present evidence of fraud that is called journalism; that is called exposing fraud when you make ridiculous claims and

then publish lawsuits to the Internet and say things like I've filed a lawsuit when in fact you haven't that's called abuse of process". At 16:19, Joe Hudson states "Hey Jason ... I just want to make a quick statement ... [I]t sounds like you know how those people develop those Ponzi schemes with fake stocks [Goodman interjects, "right"] and the stock keeps going up and up and up, and it's not really a stock, it's not really even a company ... sounds like that's what RDS is doing".

b. On September 11, 2017, Goodman and Holmes produced and published a video on YouTube entitled, "**#Unrig Espionage, Treason and Traitors in Congress**". The description of the video falsely accuses #UNRIG and Dr. McKinney of "espionage" and "treason". At 5:10 of the video, Holmes falsely accuses Dr. McKinney of being "absolutely tied into the Muslim Brotherhood". At 5:47, Goodman states "now some of the things you're saying are quite shocking and initially you know we had thought that Cynthia McKinney was simply being influenced by Robert David Steele". At 8:51, Holmes states Dr. McKinney is "backed by a very powerful group called the Muslim Brotherhood". At 12:12, Holmes states that "everyone knows, if you've listened to any of the video interviews that I've done when Trish [Negron] and Jason were working together like you know a little while back, there was a video called the 'UNRIG Cynthia McKinney' and in that video I stated and made claims about the fact that I believe from all the research I was doing that Cynthia McKinney was compromised by foreign powers or foreign nationals." At 17:36, Holmes states Dr. McKinney is "funded by the Muslim Brotherhood... [S]he is very, very insidious because she comes across as the alt left using the people language the people language, but ultimately she is Islamic. She is part of the Muslim Brotherhood program and movement." At 18:42, Holmes

states that “there is a jihad going on right now [and] Cynthia’s part of it. At 37:13, Holmes states that “Cynthia McKinney is a perfect example of somebody who has been bought by the Muslim Brotherhood, and is now presenting this people’s platform and is trying to civilize people ... wanting people to see her as a civilized being, but involved in a jihadist process without saying it. She’s using our vehicles. She’s using our methods of fund-raising. She’s doing this fake unriggered campaign which is completely fake. They never went anywhere. Basically, it never happened”. At 37:56, Goodman states, “Queen Tut, let’s examine some of the financials for Robert David Steele’s Earth Intelligence Network ... [W]e’re learning quite a lot about how charletans can take advantage of the various loopholes and just you know straight out commit fraud with these 501c3’s”. At 44:33, Goodman states that “Robert David Steele is constantly lying about the facts of everything that’s gone on from the time that he met us until today.”

c. On September 23, 2017, Goodman and Holmes produced and published a video on YouTube entitled, “**Unraveling the Deep State – Conspiracy to Suppress Free Speech**”. The video accuses Robert of engaging in a “conspiracy to suppress free speech”. At 21:45 of the video, Holmes states, “Well Jason, this is the thing that we want everyone to understand, and a lot of people already understand ... these are the kind of people who come and listen to the truth that we put out, but this is a tactic it’s the same tactic used at the macro level that we’re talking about with Bezos DARPA CIA Washington Post it’s the same tactic that RDS is using to shut down Crowdsourcethe Truth ... RDS is a disinfo agent, once CIA never not CIA, you know, and he’s been actively doing everything he can to co-opt the truther movement on the Internet, and he came after ours, our group right away because guess what we were the

ones who revealed his basic fraud that he's been perpetuating for a number of years using this electoral reform act." Goodman agrees with Holmes. At 23:32, Goodman states that "Robert David Steele is trying to reveal who Queen Tut is to prevent her from providing this evidence of fraud. People should be asking themselves why is he doing that? What is his purpose in doing that? Is it because he's an honest guy who wants to reveal the truth or is it because he is a deceptive fraudster allegedly who wants to trick people into thinking he's running a 501c3 that's going to create election reform when in fact all he's doing is trying to raise money so he can buy RVs so he can crash them and buy soft drinks and give gifts". At 24:40, Holmes states that Robert David Steele "has filed this suit. He's using this suit ... he's improperly using legal institutions and the lawsuit is ... designed to discredit and defame and embarrass and ultimately harass ... us so that we will shut up. He wants us to shut up about his fraud." At 26:41, Goodman and Holmes cast aspersion upon the Earth Intelligence Network. Goodman states "this is the Earth Intelligence Network, Robert David Steele's highly unintelligent business organization". At 36:03, Holmes states that "Robert David Steele is improperly using legal institutions ... in retaliation and as a means of suppression to shut our channel down, to shut our ability to speak the truth and what he did with this document here [referring to *Document 12*] is he actually put an affidavit to the court, filed an affidavit ... stating that they have served you, Jason, which is completely false [Goodman agrees, stating "totally false"], not only false but right here we have the evidence in front of everybody else that this affidavit this summons has somebody on the summons that has nothing to do with the suit so it's completely invalid [Jason Goodman responds, "right"], so he has taken an invalid summons and written affidavit to the court filed it to the court [Goodman

laughing on screen], now I consider this some form of legal misconduct”. At 51:26, Goodman points at the screen and states that “I can tell him he’s a moron ... It’s not a crime to be a moron, but it is a sad condition unfortunately in Robert David Steele suffers from”. At 52:29, Holmes states that “Robert David Steele is in a conspiracy to take down Crowdsourcethe Truth and he’s been involved in it for a ... while now ... Robert David Steele is a very nasty person and that man has done more for taking down really good people ... [W]e are going to make sure and we’ve already done a lot by exposing your numerous frauds and in my opinion you’re a person who needs to be put down [Goodman interjects: “legally speaking”] legally speaking absolutely legally speaking that you need to be put in a place where you can no longer affect human beings and be twisting people’s minds especially the naïve people who come on the Internet looking for truth. You’ve been twisting people’s minds for a very very long time and we want people to understand that this needs to stop and that you need to be stopped and that your association with the Muslim Brotherhood Cynthia McKinney and her funding by George Soros which we discovered recently there’s some ties going on here with Robert David Steele ... He is not a good guy.” At 55:06, Goodman states “I thought you were going to say Robert David Steele is a sociopath and it’s my opinion that he might well be that [Goodman chuckles]”.

d. On September 27, 2017, Goodman published a video on YouTube entitled, **“Fyreside Chat With What Big Eyes You Have”**. This video features Goodman with yet another caricature as his “guest”. Goodman identities the guest as “What Big Eyes You Have”. Goodman and the caricature work together and in concert to defame and disparage Robert:



At 36:43 of the video, Goodman states “[c]oincidentally, tortious interference is one of the things that Robert David Steele is suing me for so this is these guys taking a page right out of the book of all the crooks and criminals that we are trying to expose, whether it’s the Clinton Foundation and all of their felonious activity that I speak about every Sunday on Sunday with Charles with Charles Ortel or you know the very activities of Robert David Steele himself.” At 37:41, Goodman states that “this lawsuit is sort of the last-ditch effort of a tired old man who is finally being exposed for the alleged fraud that he is.”⁸

e. Many of the Goodman/Holmes video productions promoted and encouraged violence against Plaintiffs. Goodman and Holmes doxed Robert’s home address to their viewers and subscribers and used Google Maps to show a photo of Robert’s home. On September 30, 2017, Goodman and Holmes produced and published

⁸ The reference to “Fyreside” in the title of the video is to the former employer of Manuel Chavez. After Mr. Chavez expressed support for Plaintiffs, Goodman and his agents repeatedly contacted Mr. Chavez’ employer and eventually got Mr. Chavez fired.

a video on YouTube entitled, “**#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals**”. Goodman and Holmes knew that #UNRIG purchased an RV and that Robert and Congresswoman McKinney toured in the RV to promote the business of Earth Intelligence Network and the #UNRIG campaign. The Goodman/Holmes video **#fakelawsuit** opens with a frightening still shot of an exploding RV:

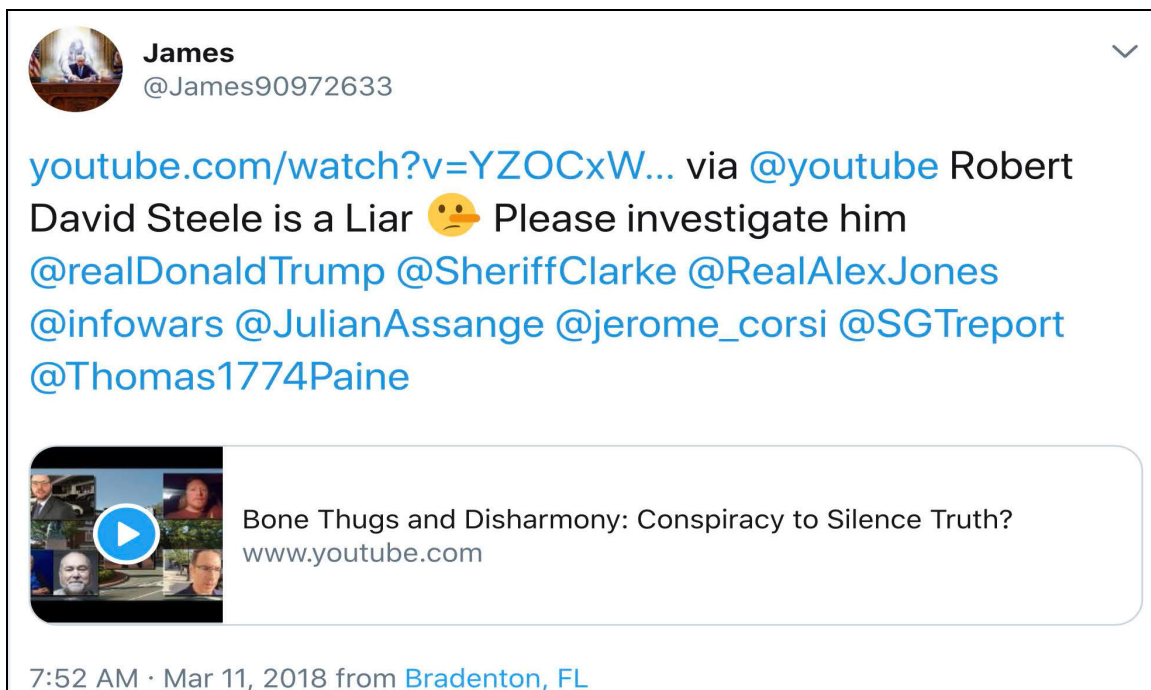


Goodman and Holmes describe the video as follows: “Crowdsourced the Truth addresses Robert David Steele's fraudulent 501c3 Earth Intelligence Network. His bully tactics are answered with a Rule 11 letter in what can only be qualified as a fake lawsuit from a real idiot.” In this video, Goodman and Holmes discuss the lawsuit. At 0:56 of the video, Goodman states “it’s a threat. We’ve been threatened. I don’t know if it’s got any validity behind it. It’s an impotent threat and that’s why we’ve named this the impotent psychological warfare of the Robber David Who Steals”. At 1:20, Goodman tells

Holmes that “we’re going to detail this hashtag fake lawsuit of the fraudulent Robert David Steele and I say that with confidence now because we have very solid evidence of fraud”. At 6:36, Goodman reveals that “Queen Tut” is a “code name” that he gave Holmes when she first contacted him in June 2017. At 7:20, Goodman claims that Robert David Steele was “changing things and trying to cover things [relating to his nomination for a Nobel Peace Prize] that he realizes were obviously or at least seemingly obviously fraudulent so that’s one thing right there.” At 8:47, Goodman calls Robert “Mr. Stupid”. At 30:23, Holmes accuses Plaintiffs of “charity fraud ... we’re going to go into the charity fraud related to the Earth Intelligence Network”. At 45:12, Goodman states that “if you are going to solicit money, charitable contributions as Robert David Steele did when he came on to Crowdsource the Truth and said he wanted to raise two hundred and fifty thousand for his fraudulent election reform campaign in which he told us and said on the Internet and in various interviews that he was going to have Rand Paul draft a bill that was going to become an act that would be this Election Reform Act, but we now know that that never happened and that there was not enough time available in the time that was you know at the time he was making that ask but he was soliciting those funds there was not sufficient time for that to even happen so that was fraudulent”. At 52:42, Holmes parrots Goodman and states “there is charity fraud here okay that’s a fact”. At 54:30, Goodman states that “we’re bringing this information forward because if someone tries to take a tax deduction on their donation to the Earth Intelligence Network, they themselves could be in legal jeopardy – you should consult your accountant and an attorney before you try to take a tax deduction on any donation made to this fraudulent

501c3. This is a public service announcement to members of the crowdsource community who have been victims of fraud – fraud executed by Robert David Steele”.

f. On October 7, 2017, Goodman and Holmes published a video on YouTube entitled, “**Bone Thugs and Disharmony: Conspiracy to Silence Truth?**”. At 54:20 of the video, Goodman states “we got idiots like Robert David Steele coming out and saying that nobody was shot [in Las Vegas]. I mean, come on. This is my opinion, but he’s a dumb guy. [Pointing at the screen]. Robert David Steele, you’re a dumb guy”. At 1:01:58, Goodman states that “I’m happy to allow it [the lawsuit] to go forward because I think what it’s going to expose ... what I believe to be charity fraud and tax fraud”. Goodman and Holmes’s false statements had a definite negative impact on Plaintiffs’ name and reputation. Viewers of the videos believed Goodman and Holmes and many times repeated the insulting words Goodman and Holmes had used. Twitter account “@James90972633” tweeted the following in response to Goodman and Holmes’s **Bone Thugs** video:



g. On October 10, 2017, Goodman published a video on YouTube entitled, **“She Put the ‘Lee’ In Legal Eagle – Special Guest Elizabeth Lee Beck”**. At 14:07 of the video, Goodman calls Robert a “hashtag real idiot”. At 16:28, Goodman states that “in this particular case, what happened was Robert David Steele came on our show and he was trying to raise two hundred and fifty thousand dollars for his UNRIG campaign. Now, he then did a bunch of things that were dishonest which led me to believe that he might possibly be raising this money in a fraudulent manner based on other things that I saw him doing and evidence that people started bringing forward and we just you know as a news organization started publishing people’s testimony and presenting people’s evidence that indicated that Robert David Steele had a pattern and practice of committing fraud”.

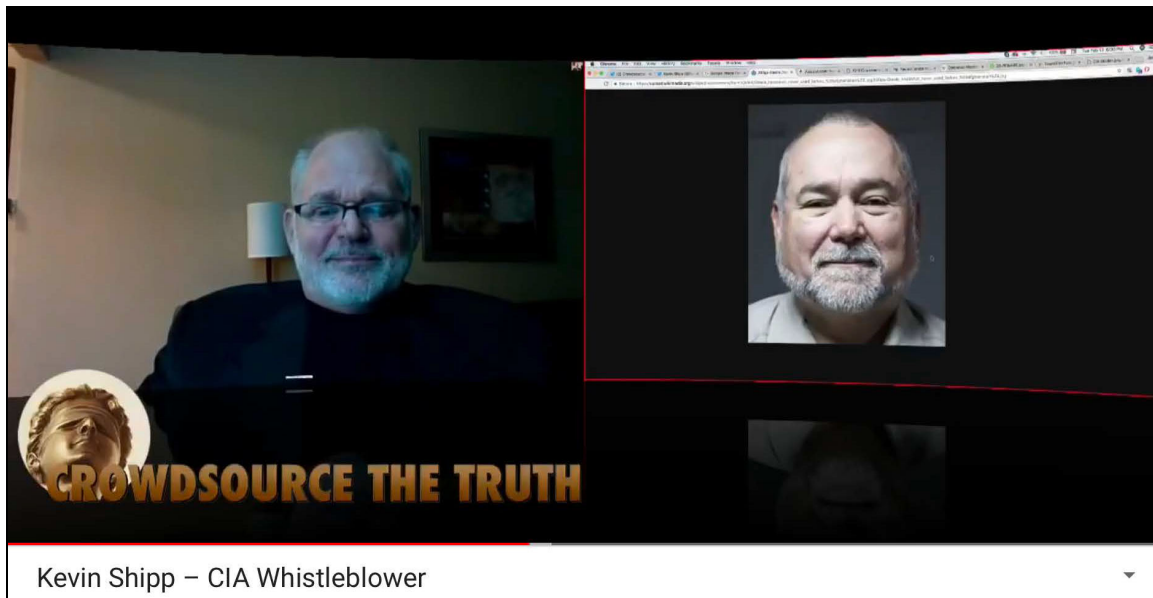
16. The relationship between Goodman and Holmes ended in late December 2017. On December 27, 2017, the “Hoax Wars” YouTube channel published a video entitled, **“The Queen Tut Tapes #1: Trish Has Spent \$8,000 Defending RDS Lawsuit”**. During the video, Holmes announced that she had “left CSTT”.

C. Goodman’s False And Defamatory Statements in 2018 and 2019

17. Since December 25, 2017, Goodman has published false and defamatory statements about Plaintiffs in over thirty (30) more videos uploaded to YouTube, including the following:

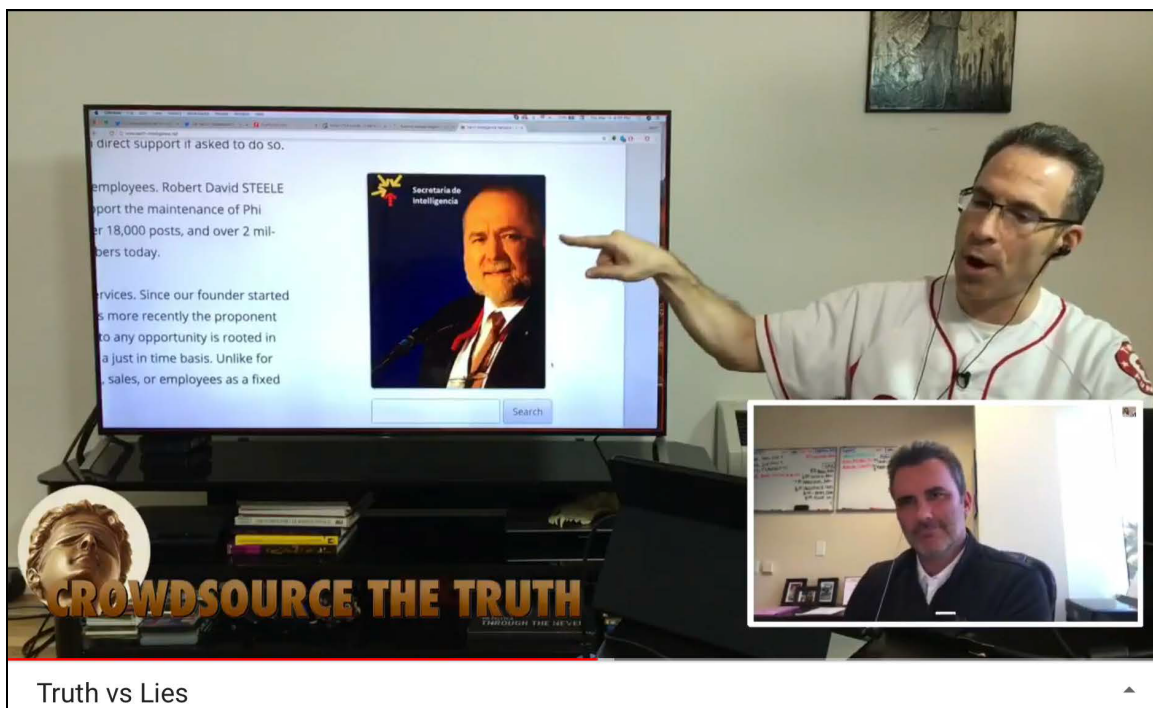
a. On February 13, 2018, Goodman published a video on YouTube entitled, **“Kevin Shipp – CIA Whistleblower”**. At 30:22 of the video, the guest (Kevin Shipp) states “that’s why whenever the Washington Post says they have sources and they won’t say who they are, its CIA disinformation without a doubt.” At 30:29, Goodman

states “well I certainly can’t immediately think of anyone like that who might be lying about things constantly and you know spreading disinformation”. Goodman’s statement is of and concerning Robert. As Goodman makes this statement, he displays the following image on screen:



b. On March 5, 2018, Goodman published a video on YouTube entitled, “**Ole Dammegard & Cody Snodgres – False Flags Pattern Recognition from JFK to Parkland School Shooting**”. At 10:42 of the video, Goodman states “there’s a lot of people who always question anytime we have someone come forward and say they used to work with the CIA, the tendency is to question that of course. We’ve seen buffoons like Robert David Steele, who people tell me actually did work for the CIA, but he seems to be running a number of frauds. I’ve pointed to evidence where he’s doing charity fraud. How do we know when someone’s being honest about their clandestine background versus remaining a part of clandestine operations, who might be trying to – and I’m not suggesting that you’re doing this [referring to the guests] – but someone like Robert David Steele who seems to be trying to infiltrate this truth-seeking community”.

c. On March 15, 2018, Goodman published a video on YouTube entitled, “**Truth vs Lies**”. At 27:35 of the video, Goodman states “Like Joe, when I tell you and the rest of the people in the crowdsource community that Robert David Steele is a fraud I say that because I have evidence that he’s committed charity fraud”. At 35:18, Goodman states “[a]m I lying Joe? Have I fabricated this information with the specific intent of defaming this robber who steals. This fraud [pointing at and referring to Robert].” Goodman forcibly points at the screen:

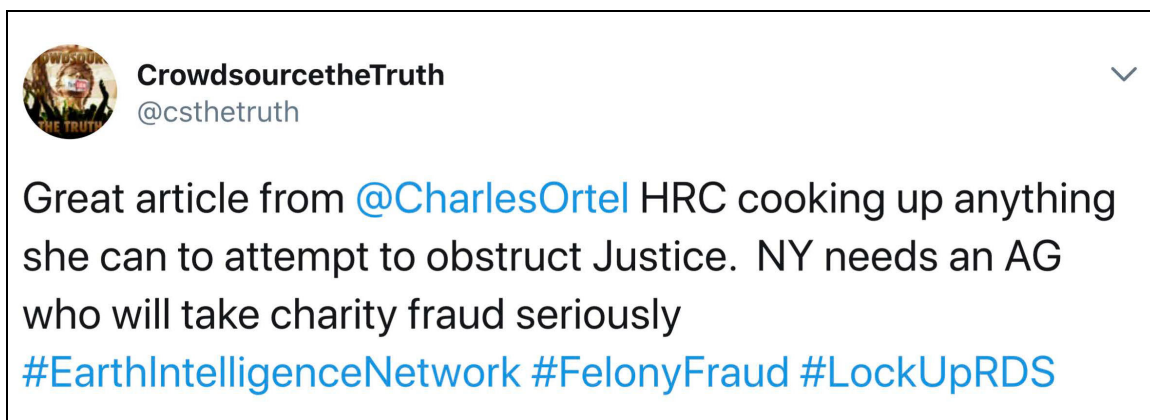


Goodman continues the rant about Robert. He states “this tiny man who goes on the Internet and deliberately lies, okay. Robert David Steele is also fundamentally a fraud because he behaves in a consistently fraudulent way”. At 37:09, Goodman calls Robert a “lying miscreant”. At 39:16, Goodman states “I want evidence from Pro Publica to show that this guy’s a liar [points to Robert on screen in background] and you know the other thing that’s very interesting about that lawsuit Joe is the involvement of Susan Lutzke,

also a liar known as Queen Tut ... Susan Lutzke sometimes she goes by Susan Holmes. On this program, she went by 'Queen Tut'".

d. On April 17, 2018, Goodman published a video on YouTube entitled, **"Tea Party in Teaneck Take Two"**. At 37:30 of the video, Goodman states that "Robert David Steele came on my program. In the course of about an hour or two, our audience raised \$15,000 for this charitable organization [Earth Intelligence Network] a 501c3, tax exempt charity. Now there's a lot of laws that govern the operations of these 501c3s ... and in addition to being registered as a tax-exempt organization, these types of charities need to be specifically registered in each state they operate in. You can't just go around soliciting funds in New York without being registered with the New York State Bureau of Charities". At 45:23, Goodman states "I have evidence that this person's 501c3 organization is operating fraudulently in the state of New York. The lack of registration with the New York State Bureau of Charities indicates that the solicitation of two hundred and fifty thousand dollars in the state of New York over the Internet is felony charity fraud".

e. On May 9, 2018, Mr. Goodman tweeted the following statement:



f. Between May 17, 2018 and July 4, 2019, Goodman published another twenty (20)+ videos containing the same or similar false, derogatory, disparaging, defamatory and insulting statements, implications and insinuations about Plaintiffs, including accusations of “felony charity fraud”, tax fraud, “fraud”, “perjury”, commission of a “crime”, conduct that would subject Plaintiffs to “prison”, “perpetration” of “this dirty bomb hoax .. [that] is ultimately aimed at helping to take down President Trump”, conspiracy, “psychological operation[s]” to “co-opt” people, abuse of process, “lawfare”, “deceptive” operations, “persistent” lying (“he lied about being nominated for the Nobel Peace Prize”), *see*:

<https://www.youtube.com/watch?v=JaA33LEcCrI> (May 17, 2018);

https://www.youtube.com/watch?v=JbqmsY_7UDA (May 26, 2018);

<https://www.youtube.com/watch?v=LhmeaTU8T5E> (June 7, 2018);

<https://www.youtube.com/watch?v=h1fFYuxcoCE> (June 21, 2018);

<https://www.youtube.com/watch?v=TtAG7eBbpI4> (June 21, 2018);

<https://www.youtube.com/watch?v=HEX-AqtaXuU&frags=pl%2Cwn>
(June 27, 2018);

https://www.youtube.com/watch?v=VUVT1hY_vas&frags=pl%2Cwn
(June 30, 2018);

<https://www.youtube.com/watch?v=GeXeXPWui2g&frags=pl%2Cwn>
(July 24, 2018);

<https://www.youtube.com/watch?v=NYbMW2NZqU4&frags=pl%2Cwn>
(August 6, 2018);

<https://www.youtube.com/watch?v=agcQMe8gsmo&frags=pl%2Cwn>
(August 7, 2018);

<https://www.youtube.com/watch?v=N2uWG7moD7Q&frags=pl%2Cwn>
(August 20, 2018);

<https://www.youtube.com/watch?v=rThDixbtnCI&frags=pl%2Cwn>
(August 21, 2018);

https://www.youtube.com/watch?v=XgTwwAX4_1o&frags=pl%2Cwn
(August 27, 2018);

<https://www.youtube.com/watch?v=sqVUiOsMB70> (September 14, 2018);

<https://www.youtube.com/watch?v=FFZKTGkoNE8> (December 1, 2018);

<https://www.youtube.com/watch?v=7GWkMxKH0FU> (March 22, 2019);

<https://www.youtube.com/watch?v=iBteEdD66Jc> (April 6, 2019);

<https://www.youtube.com/watch?v=WwyRPFhW-HE> (April 30, 2019);⁹

<https://www.youtube.com/watch?v=aUeNLLWikiM> (May 1, 2019);

<https://www.youtube.com/watch?v=77RZ09Jp46Y> (May 12, 2019);

<https://www.youtube.com/watch?v=KC8E-AdKSM0> (July 4, 2019).

18. In order to broadly spread the defamation so as to maximize the harm to Plaintiffs, Goodman habitually republished his YouTube videos to his subscribers, followers and viewers on Twitter, Periscope, Patreon and other social media platforms.

19. Goodman, Negrón and Holmes's false and defamatory statements (detailed above) have devastated Robert and have destroyed the business of the Earth Intelligence Network. Goodman, Negrón and Holmes's statements cast aspersion on Plaintiffs' honesty, prestige or standing in their field of business. Robert's honor has been stolen. His name and reputation have been publicly impugned, across YouTube,

⁹ This video interview with Holmes, published by Goodman on YouTube April 30, 2019, includes the following statement: "Susan Lutzke aka Susan Holmes aka Queen Tut is a horrible but frequent liar. She recently called me, revealing a long suspected conspiracy between her, D. George 'Acton' Sweigert and Robert David Steele ... The sinister plans of these malicious social engineers are being revealed before our eyes as the fraudulent and vexatious lawsuit brought by Steele continues to crumble."

Twitter, and permanently injured on and through Steemit. Robert has been attacked and discredited on every YouTube channel, where he was once popular, to the point that most hosts are not inviting Robert back. Those hosts that know Robert well have been forced to delete and ban hundreds of disparaging remarks by Goodman, Negron, Holmes and their agents and followers, or turn off comments altogether, which has hurt Robert and various communities that valued how Robert would engage within the comments section after each interview, often answering questions and providing links where the interested party could learn more. Plaintiffs have suffered both presumed and actual damages, including insult, including pain, embarrassment, humiliation, and mental suffering, injury to reputation, and out-of-pocket loss. At a financial level, Plaintiffs lost sponsors and were forced to refund donations because of Defendants' false claims of "fraud", "stealing", "scam", etc. Donations to the #UNRIG campaign prior to Goodman, Negron and Holmes's defamation totaled over \$29,200 per month and were trending higher. Because of Goodman, Negron and Holmes's defamation and insulting words, monthly donations to Earth Intelligence Network's business dwindled to around \$200 by November 2017.

COUNT I – DEFAMATION *PER SE*

20. Plaintiffs restate paragraphs 1 through 19 of this Second Amended Complaint, and incorporate them herein by reference.

21. Goodman, Negron and Holmes published and republished to third-parties – including, without limitation, CSTT YouTube subscribers, Goodman's followers on Twitter (@csthetruth) and Periscope, CSTT's Facebook followers, and patrons of CSTT

on Patreon – numerous false factual statements, which are detailed verbatim above, of or concerning Plaintiffs.

22. Goodman, Negron and Holmes’s statements are false because Plaintiffs did not solicit charitable donations from persons in New York and did not commit charity fraud, knowingly or unknowingly, or fraud of any kind on any person, ever. The representations on Robert’s website are truthful and accurate. Robert wrote the NATO Open Source Handbook. Robert was nominated for the Nobel Peace Prize. Plaintiffs did not ever steal or embezzle anything, including donations, from anyone.

23. Goodman’s publications and republications occurred without privilege of any kind.

24. Negron and Holmes’ published false and defamatory statements in furtherance of a joint scheme with Goodman to defame Plaintiffs. Goodman is liable for Negron and Holmes’s tortious acts. *Pinkerton v. United States*, 328 U.S. 640, 646-647 (1946); *id. McFarland v. McFarland*, 684 F.Supp.2d 1073, 1085 (N.D. Iowa 2010); *In re Orthopedic Bone Screw Products Liability Litigation*, 1997 WL 186325, at * 17 (E.D. Pa. 1997).

25. By publishing YouTube videos, tweets, retweets and other statements on the Internet and by soliciting comments from third-parties, Goodman, Negron and Holmes knew or should have known that their defamatory statements would be republished over and over by third-parties to Plaintiffs’ detriment. Republication by both identified subscribers, users, and patrons, and anonymous persons was the natural and probable consequence of Goodman, Negron and Holmes’s actions and was actually and/or presumptively authorized Goodman, Negron and Holmes. In addition to the

original publications, Goodman, Negrón and Holmes are liable for the republication of the false and defamatory statements by third-parties under the doctrine announced by the Supreme Court of Virginia in *Weaver v. Home Beneficial Co.*, 199 Va. 196, 200, 98 S.E.2d 687 (1957) (“where the words declared on are slanderous per se their repetition by others is the natural and probable result of the original slander.”).

26. Goodman, Negrón and Holmes’s false statements constitute defamation *per se*. The statements accuse and impute to Plaintiffs the commission of numerous crimes involving moral turpitude and for which Plaintiffs may be punished and imprisoned in a state or federal institution. The statements impute to Plaintiffs an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or employment. Goodman, Negrón and Holmes’s statements also prejudice Plaintiffs in their profession or trade.

27. Goodman, Negrón and Holmes’s false statements have permanently and irreparably harmed Plaintiffs and their reputations.

28. Goodman, Negrón and Holmes acted with actual malice and reckless disregard for the truth for the following reasons:

a. Goodman, Negrón and Holmes intentionally set out to destroy Plaintiffs’ reputation with falsehoods. The false and defamatory statements in the YouTube videos, tweets, and retweets were published in retaliation and reprisal for Robert’s decision, following the dirty bomb hoax, to have nothing to do with Goodman or CSTT.

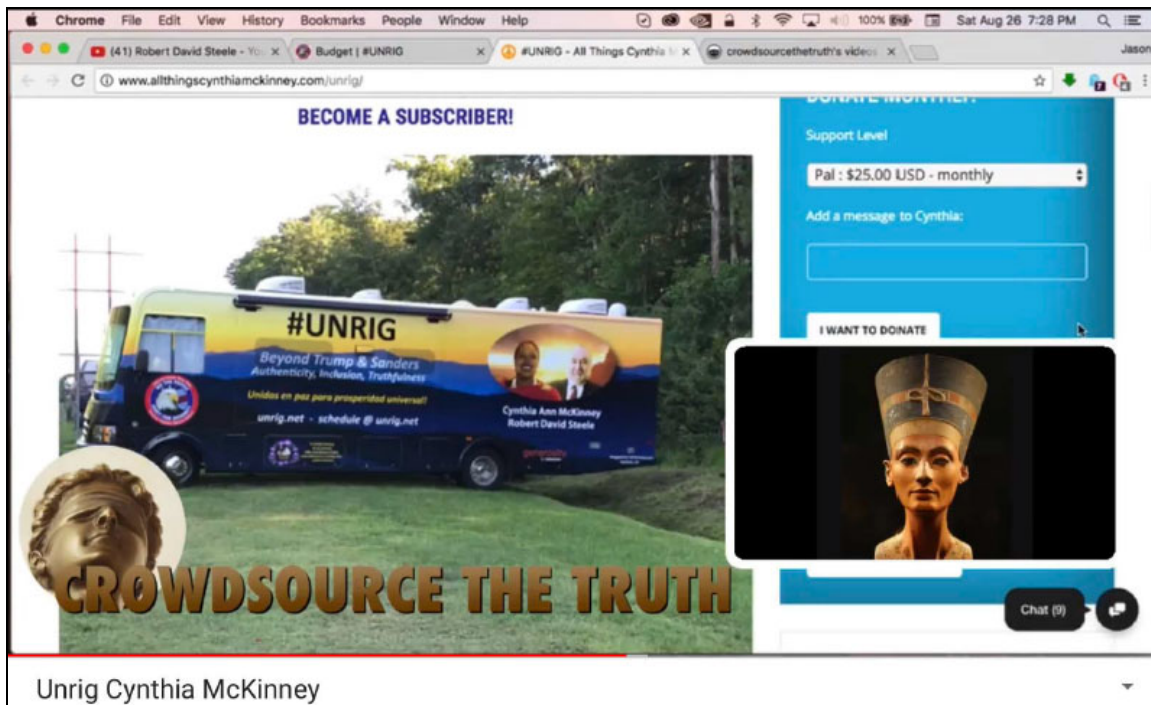
b. Goodman, Negrón and Holmes’s statements were knowingly false, with not a shred of supporting evidence. Goodman, Negrón and Holmes unequivocally

accused Plaintiffs of committing “felony charity fraud”, even though Goodman, Negron and Holmes did not know whether Plaintiffs had ever or could ever commit such a crime and in spite of the fact that no complaint had ever been made by any person, no charges had ever been brought, and no findings had ever been made by any Court or Tribunal that Plaintiffs had committed any crime. Moreover, from their constant review of Plaintiffs’ websites, Goodman, Negron and Holmes knew that the Plaintiffs fulfilled every commitment made to donors. Every donor to #UNRIG, including Goodman and Holmes received a certificate as a Founding Citizen:



Goodman, Negron and Holmes knew and acknowledged in videos that Plaintiffs (a) actively promoted the mission of #UNRIG and communicated with all donors; (b) accounted for every penny spent in a budget that was posted online, <https://www.unrig.net/budget-report/>; (c) honored all requests for refunds of donations; (d) offered a free #UNRIG store and ideas for do-it-yourself merchandise, such as T-Shirts, posters, bumper stickers, and other items; (e) acquired and professionally wrapped an RV, and began a national tour of the Country in furtherance of the “Summer of Peace”

campaign; and (f) published and appeared in multiple video interviews to promote the #UNRIG campaign. Goodman's own videos, including "**UNRIG Cynthia McKinney**", demonstrate that he actively reviewed Plaintiffs' websites and learned all about the #UNRIG campaign, including Plaintiffs' use of a professionally-wrapped RV as part of the "Summer of Peace" tour. Goodman's videos feature screenshots of Plaintiffs' websites, *e.g.*:



The #UNRIG campaign was fully disclosed in all material respects on the website www.unrig.net. Goodman knew that Plaintiffs were engaged in a legitimate full-time effort to unrig the system, "to restore integrity and truth to governance, with the informed will and wisdom of We the People at its heart", and "to enjoy a transparent government by 2022, that operates with honesty, respecting our planet and the human spirit, so that we may create a healthy, prosperous America rooted in truth with peace as our shared condition":



Despite their actual knowledge to the contrary, Goodman, Negrón and Holmes published false and defamatory statements that #UNRIG was a “scam” and that Plaintiffs were defrauding and stealing from donors. Goodman, Negrón and Holmes also intentionally ignored online evidence, such as General Kernan’s Preface to the NATO Open Source Handbook, that proved their statements about Robert were false.

c. Goodman, Negrón and Holmes chose to manufacture and publish false and scandalous statements and use unnecessarily strong and violent language, disproportionate to the occasion. Indeed, in multiple videos Goodman, Negrón and Holmes expressed clear and convincing feelings of contempt, ill-will and animus towards the Plaintiffs.

d. Goodman, Negrón and Holmes made up facts out of whole cloth. They did not act in good faith because, in the total absence of evidence, they could not have had an honest belief in the truth of their statements about Plaintiffs.

e. Goodman, Negrón and Holmes reiterated, repeated and continue to republish their false defamatory statements, and enticed others to do so, out of a desire to hurt Plaintiffs and to permanently stigmatize and destroy the Plaintiffs.

29. Goodman, Negron and Holmes lacked reasonable grounds for any belief in the truth of their statements and acted negligently in failing to determine the true facts.

30. As a direct result of Goodman, Negron and Holmes's defamation, Plaintiffs each suffered substantial damage and loss, including, but not limited to, presumed damages and actual damages, loss or injury to business, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to reputation, prestige and standing, costs, expenses and out-of-pocket loss in the sum of \$1,000,000 or such greater amount as is determined by the Jury.

COUNT II – INSULTING WORDS

31. Plaintiffs restate paragraphs 1 through 30 of this Second Amended Complaint, and incorporate them herein by reference.

32. Goodman and Holmes's insulting words, in the context and under the circumstances in which they were produced, published, tweeted, retweeted, written and used, tend to violence and breach of the peace. Like any reasonable person, Robert was humiliated, disgusted, angered and provoked to violence by the insulting words.

33. Goodman and Holmes's false and slanderous words are fighting words, which are actionable under § 8.01-45 of the Virginia Code (1950), as amended.

34. As a direct result of Goodman and Holmes's insulting words, Plaintiffs each suffered substantial damage and loss, including, but not limited to, presumed damages and actual damages, loss or injury to business, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to reputation, prestige and standing, costs, expenses and

out-of-pocket loss in the sum of \$1,000,000 or such greater amount as is determined by the Jury.

COUNT III – BUSINESS CONSPIRACY

35. Plaintiffs restate paragraphs 1 through 34 of this Second Amended Complaint, and incorporate them herein by reference.

36. Beginning in June 2017 and continuing through December 25, 2017, Goodman, Negrón and Holmes combined, associated, agreed or acted in concert together and with others, including Scott Creighton, for the express purpose of injuring the Earth Intelligence Network and #UNRIG in its business and reputation through the publication and republication of false and defamatory statements. In furtherance of the conspiracy and preconceived joint plan, Goodman, Negrón and Holmes orchestrated a scheme the unlawful purpose of which was to defame Robert and #UNRIG and destroy their reputations and business. Acting in concert, Goodman, Negrón and Holmes utilized email, text messages, the Internet and various social media properties, including YouTube, Twitter, Facebook, and Patreon, to publish, republish and spread the defamation and character assassination.

37. Goodman, Negrón and Holmes acted intentionally, purposefully, without lawful justification, and with the express knowledge that they were injuring the #UNRIG campaign and Earth Intelligence Network.

38. Goodman, Negrón and Holmes's actions constitute a business conspiracy in violation of § 18.2-499 of the Code.

39. As a direct result of Goodman, Negrón and Holmes's misconduct, Earth Intelligence Network suffered damage and loss, including, but not limited to, injury to its

business, property loss, injury to its trade and professional reputation, loss of prestige and standing, attorney's fees, court costs, and other damages in the sum of \$1,000,000.00 or such greater amount as is determined by the Jury.

40. In accordance with § 18.2-500 of the Virginia Code, Earth Intelligence Network seeks three-fold the damages by it sustained as determined by the Jury.

COUNT IV – COMMON LAW CONSPIRACY

41. Plaintiffs restate paragraphs 1 through 40 of this Second Amended Complaint, and incorporate them herein by reference.

42. Goodman, Negron and Holmes's actions, detailed above, constitute a conspiracy at common law.

43. As a direct result of Goodman, Negron and Holmes's willful misconduct, Plaintiffs suffered presumed and actual damage and loss, including, but not limited to, injury to business, property loss, injury to professional and personal reputations, loss of prestige and standing, insult, humiliation, embarrassment, pain and mental suffering, court costs, and other damages in the sum of \$1,000,000.00 or such greater amount as is determined by the Jury.

COUNT V – UNAUTHORIZED USE OF NAME AND PICTURE (§ 8.01-40)

44. Plaintiffs restate paragraphs 1 through 43 of this Second Amended Complaint, and incorporate them herein by reference.

45. Between 2017 and the present, Goodman knowingly used Robert's name and picture without having first obtained Robert's written consent for advertising purposes and for purposes of trade. Throughout his video productions, Goodman uses Robert's name and picture to generate business for CSTT (*i.e., merchandise sales,*

donations, increased subscribership, and monetization of CSTT's YouTube Channel). In each video, Goodman solicits financial contributions and subscriptions.

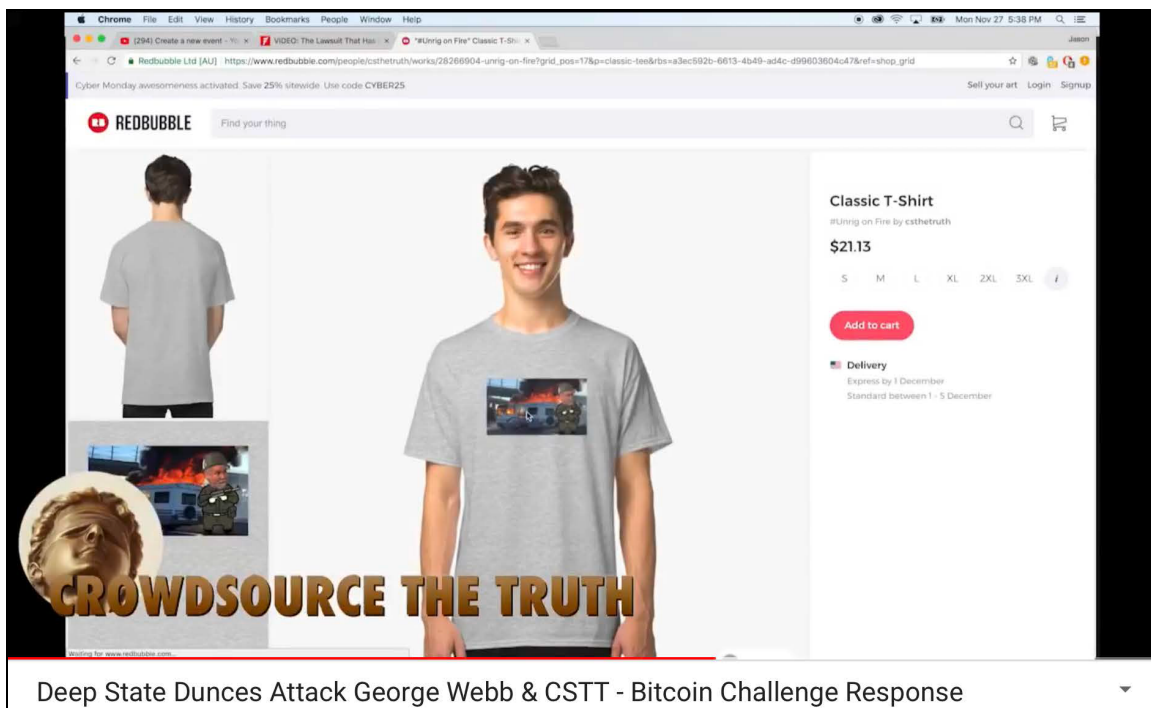
46. Robert was never asked and never consented to Goodman's use of his name or picture for any reason.

47. On November 27, 2017, for instance, Goodman published a video on YouTube entitled, **"Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response"**. The video opens with the following insulting picture and words:¹⁰



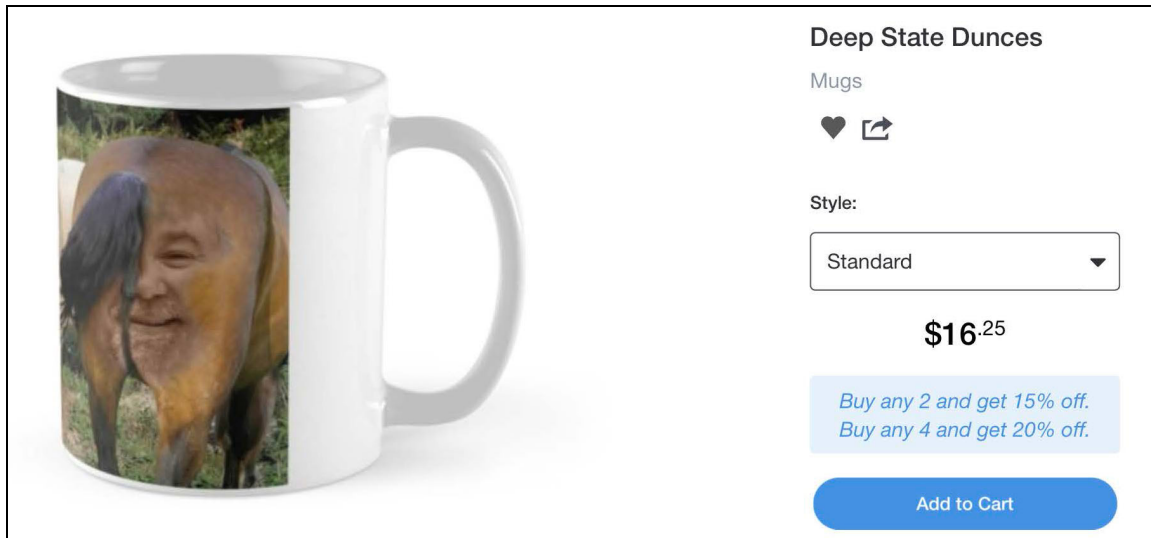
¹⁰ The other persons depicted in the picture are Manuel Chavez (the pig) and Dave Acton (in the straight-jacket). Dave Acton a/k/a David Sweigert is the brother of George Webb. "George Webb" is an individual who appears with Goodman and Negrón in several of the videos at issue in this action.

At 14:20 of the video, Goodman reveals that “Red Bubble¹¹ is the website that all the Crowdsourcethe Truth merchandise is available on ... and all the deep state idiots, everybody’s favorite real idiot who is mounting a fake lawsuit”. At 14:45 of the video, Goodman goes on a verbal tirade in which he claims that it is his First Amendment right to “express my opinion that a Robber Who Steals is a [sic] IDIOT, such a dummy, such a loser, and you know what, losers lose, that’s what they do.” The **Deep State Dunces** video shows Goodman and CSTT using Robert’s picture on t-shirts:



Goodman and CSTT were and are selling coffee mugs with Robert’s picture on them, *e.g.*:

¹¹ “Red Bubble” is a website that advertises for sale products that are designed by “independent artists”. CSTT advertises and sells its merchandise through Red Bubble.



[<https://www.redbubble.com/i/mug/Unrig-on-Fire-by-csthetruth/28266904.9Q0AD>].

48. Goodman knowingly misappropriated Robert's name and picture. He created the memes and designed for the t-shirts and mugs. He supplied descriptive language to be included on the Redbubble website (e.g., the phrase "*The fraudulent efforts of the Robber David who Steals are going up in flames*"), search terms and instructed Redbubble to code its website to tag Robert's name in searches, see, e.g., <https://www.redbubble.com/shop/robert+david+steele>; <https://www.redbubble.com/i/t-shirt/Unrig-on-Fire-by-csthetruth/28266904.0S66D>.

49. Goodman's misappropriation continues to this very day. Goodman continues to sell merchandise featuring Robert's name and picture.

50. Goodman knowingly used Robert's name and picture in violation of § 8.01-40 of the Code.

51. Robert suffered damages resulting from Goodman's unlawful use of Robert's name and picture. He seeks disgorgement of all income received by Goodman from or as a result of Goodman's unlawful use, punitive damages in the maximum amount allowed by law, attorney's fees, and costs.

52. In addition to money damages, Robert requests the Court to permanently enjoin and order Goodman to (a) cease and desist from any further use of Robert's name and/or picture for advertising or trade purposes, (b) remove or cause to be removed from the Internet and social media, including YouTube, Twitter, and Patreon, all merchandise and products, videos, tweets, retweets, blogs and posts that contain Robert's name and picture.

53. Monetary damages will not provide an adequate remedy for Robert because, in the event Goodman continues to use Robert's name and picture in trade, Robert would be required to bring a succession of lawsuits to deter Goodman from continuing to violate the law. Monetary damages may not effectively deter either "judgment proof" or wealthy defendants.

54. In light of the balance of the hardships between Robert and Goodman, remedy in equity is warranted because Goodman remains able to produce videos and sell merchandise that does not contain Robert's name or picture.

55. Public interest would be served by an injunction narrowly tailored to prohibit the use of Robert's name, picture or likeness in videos and on merchandise sold by Goodman or CSTT. Such an injunction protects the important interest in a person's name and picture and does not infringe on any right or interest of Goodman.

56. Because Goodman has engaged in repeated unlawful acts and his use of Robert's name and picture threatens to continue in the future, Goodman should be permanently restrained and enjoined from any further use of Robert's name or picture.

Plaintiffs allege the foregoing based upon personal knowledge, public statements of others, and records in their possession. Plaintiffs believe that substantial additional evidentiary support, which is in the exclusive possession of Goodman, Negron, Holmes and their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Plaintiffs reserve the right to amend this Complaint upon discovery of additional instances of Goodman's defamation and wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request the Court to enter Judgment against Goodman as follows:

- A. Compensatory damages in the sum of \$1,000,000.00;
- B. Three-fold Damages in accordance with § 18.2-500 of the Virginia Code in the total sum of \$3,000,000.00;
- C. Punitive damages in the amount of \$350,000.00 or the maximum amount allowed by law;
- D. Prejudgment interest at the maximum rate allowed by law from;
- E. Postjudgment interest at the rate of six percent (6%) per annum until paid;
- F. Attorney's Fees and Costs;
- G. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: September 24, 2020

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendant, Goodman.

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